

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NORTHWEST ADMINISTRATORS, INC., a  
Washington corporation,

Plaintiff,

v.

THE AMERICAN BOTTLING COMPANY, a  
Delaware corporation,

Defendant.

No. 2:22-cv-01280-JHC

**JOINT MOTION TO STAY ALL  
DEADLINES PENDING  
PRODUCTION OF DOCUMENTS  
FOR AUDIT AND ORDER**

**NOTE ON MOTION CALENDAR:  
November 29, 2022**

Plaintiff, Northwest Administrators, Inc. (“Plaintiff” or “Northwest”) and Defendant The American Bottling Company (“Defendant” or “ABC”), by and through their respective undersigned counsel, hereby jointly request this Court enter an Order staying all deadlines in this case for an additional sixty (60) days to January 30, 2023 pending Defendant’s production of documents for the audit requested in the Complaint, and in support thereof, state as follows:

1. On or around September 10, 2022, Plaintiff filed its Complaint. (Dkt. No. 1).
2. On October 4, 2022, the Parties filed a Stipulation extending the deadline for Defendant’s Answer to November 4, 2022, which the Court granted on October 13, 2022. (Dkt. No. 7).
3. On October 13, 2022, the Court entered a Scheduling Order setting deadlines for this case. (Dkt. No. 8).

JOINT MOTION TO STAY DEADLINES - 1  
Case No. 2:22-cv-01280-JHC

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- 1 4. The Complaint seeks an Order Compelling Audit under which Defendant shall be directed  
2 by the Court within a specified time to make available to the Plaintiff certain records for  
3 the period of January 1, 2017 through December 31, 2020 to allow Plaintiff to complete a  
4 payroll-compliance audit.
- 5 5. On November 3, 2022, this Honorable Court entered a stay in this matter for thirty (30)  
6 days to November 30, 2022 to allow the Defendant to produce records pursuant to an  
7 agreement among the Parties to limit the scope of the records sought. (Dkt. No. 12).
- 8 6. The Defendant is still working on gathering the documents to produce to Plaintiff that  
9 would resolve this lawsuit, which has required more time than initially expected, in part  
10 due to the intervening holidays.
- 11 7. As a result, the Parties seek a stay of all deadlines in this case including but not limited to  
12 the Defendant's deadline to answer or otherwise respond to the Complaint for an additional  
13 sixty (60) days to Monday January 30, 2023 to allow for the agreed-upon documents to be  
14 produced.<sup>1</sup>
- 15 8. The Parties make this request not for the purposes of delay, but rather to avoid the  
16 expenditure of unnecessary cost of litigation in anticipation that this matter will be  
17 resolved.

18 WHEREFORE, the Parties jointly request that this Court enter an Order staying all  
19 deadlines in this case, including Defendant's deadline to answer or otherwise respond to the  
20 Complaint, for sixty (60) additional days to January 30, 2023 to allow for Defendant's production  
21 of documents to Plaintiff.  
22  
23  
24  
25

26 <sup>1</sup> Defendant has requested this time frame taking into account the Christmas holidays to ensure that an additional extension is not required.

DATED this 29<sup>th</sup> day of November, 2022.

s/ Rylan Weythman

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*Attorneys for Plaintiff*

IT IS SO ORDERED.

Dated this 30th of November, 2022.



The Honorable John H. Chun  
United States District Judge